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7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 ROBERT GUY RUSSELL,
15 Defendant.

Case No. 2:20-cr-00059-APG-DJA
**STIPULATION TO CONTINUE
SENTENCING**
(First Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
17 Trutanich, United States Attorney, and Simon F. Kung, Assistant United States Attorney,
18 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
19 and Brian Pugh, Assistant Federal Public Defender, counsel for Robert Guy Russell, that the
20 Sentencing Hearing currently scheduled on February 16, 2021 at 9:30 am, be vacated and
21 continued to a date and time convenient to the Court, but no sooner than ninety (90) days.

22 This Stipulation is entered into for the following reasons:

- 23 1. The defendant is attempting to gather documents for probation, including but
24 not limited to medical records, to assist in its preparation of the presentence
25 investigation report. The holidays and the impact of COVID-19 have slowed
26 the process of obtaining the records.

2. Counsel for the defendant needs additional time to conduct investigation in this case which is relevant to the sentencing and disposition.
3. Defendant is not incarcerated and does not object to a continuance.
4. The parties agree to the continuance.

This is the first request for continuance filed herein.

DATED this 4th day of January 2021.

RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

By /s/ Brian Pugh
BRIAN PUGH
Assistant Federal Public Defender

By /s/ Simon F. Kung
SIMON F. KUNG
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ROBERT GUY RUSSELL,

7 Defendant.

Case No. 2:20-cr-00059-APG-DJA

ORDER

9
10 Based on the Stipulation of counsel and good cause appearing,
11 IT IS THEREFORE ORDERED that the Sentencing Hearing currently scheduled on
12 February 16, 2021 at the hour of 9:30 a.m., be vacated and continued to June 1, 2021 at the
13 hour of 10:30 a.m. in Courtroom 6C.

14 DATED this 6th day of January 2021.

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16 

17 UNITED STATES DISTRICT JUDGE